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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUSTIN WARD, DAVID KREVAT, and  
NABIL MOHAMAD, individually and on  
behalf of others similarly situated,  
Plaintiffs,

v.

PRIME TRUST, LLC; and DOES 1-10,  
Defendant(s).

Case No. 2:22-cv-02034-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

**(First Request)**

**STIPULATION**

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, it is hereby stipulated and agreed by and among Defendant Prime Trust, LLC ("Prime Trust") and Plaintiffs Austin Ward, David Krevat, and Nabil Mohamad (collectively "Plaintiffs") that:

1. On November 2, 2022, Plaintiffs commenced this action by filing a complaint in the

Eighth Judicial District Court of Clark County, Nevada as Case No. A-22-860739B (“State Court Action”).

2. On December 7, 2022, Prime Trust removed the case to this Court. ECF No. 1.

3. Plaintiffs intend to file a Motion to Remand the case to state court.

4. To accommodate conflicts created by the upcoming holiday season, the Parties agree to the following briefing schedule:

Event	Date
Plaintiffs’ Proposed Motion to Remand	
Deadline for Plaintiffs to file Motion to Remand	December 30, 2022
Deadline for Prime Trust to oppose Plaintiffs’ Motion to Remand	January 20, 2023
Deadline for Plaintiffs’ Reply in Support of the Motion to Remand	February 3, 2023
Prime Trust’s Response to the Complaint	
Deadline for Prime Trust to respond to the Complaint	January 27, 2023
Deadline for Plaintiffs to oppose any motion filed by Prime Trust in response to the Complaint	February 24, 2023
Deadline for Prime Trust’s Reply in Support of any motion filed in response to the Complaint	March 10, 2023

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5. This is the Parties' first request for an extension of any deadline in this case. The requested extension is not intended to cause any delay or to prejudice any party.

KEMP JONES, LLP

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By: /s/ Mona Kaveh

By: Eric D. Walther

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### **ORDER**

**IT IS SO ORDERED.**

  
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U.S. MAGISTRATE JUDGE

DATED: December 14, 2022